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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, )  
Plaintiff, )  
vs. )  
STEPHEN T. PARSHALL, )  
ANDREW LYNAM, and )  
WILLIAM LOOMIS, )  
Defendant. )

Case No. 2:20-CR-00128-KJD-BNW

**STIPULATION TO CONTINUE CALENDAR  
CALL AND TRIAL DATE**

**(Sixth Request)**

IT IS HEREBY STIPULATED AND AGREED by and between, Jason M. Frierson, United States Attorney, District of Nevada, Daniel Schiess, Assistant United States Attorney, counsel for the United States of America; Richard A. Wright, Esquire and Monti Jordana Levy, Esquire, counsel for Defendant William L. Loomis, Robert M. Draskovich, Esquire, counsel for Defendant Stephan T. Parshall; Thomas F. Pitaro, Esquire, counsel for Defendant Andrew Lynam; that the calendar call scheduled for October 25, 2022, at 9:00 a.m. and the trial scheduled for October 31, 2022, at 9:00 a.m., be vacated and continued to a date and time convenient to the Court but no sooner than May 6, 2023.

IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and including January 30, 2023, to file any pretrial motions and notices of defense.

1 IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and including  
2 February 13, 2023, to file any responsive pleadings.

3 IT IS FURTHER STIPULATED AND AGREED, that the parties shall have to and including  
4 February 20, 2023, to file any responsive pleadings.

5 This stipulation is entered into for the following reasons:

6 1. The Defendants need additional time to review discovery and to prepare for trial, and  
7 to consider negotiations.

8 2. The discovery in this case includes numerous lengthy recordings of the interactions  
9 of the defendants with a cooperating individual and an undercover agent. Many of the recordings  
10 are difficult to hear and the review with the defendants is difficult because of their detention and the  
11 difficulties of meeting in person with the defendants due to the pandemic. The utilization of video  
12 visits, which are difficult to arrange are not an adequate method to review audio recordings. Counsel  
13 for Defendant Loomis has utilized an audio enhancement expert for analysis of some of the evidence  
14 and this is an ongoing process.

15 3. The defendants are incarcerated and do not object to the request for a continuance.

16 4. The denial of this request could result in a miscarriage of justice, and the ends of  
17 justice served by granting this request outweigh the best interest of the public and the defendant in  
18 a speedy trial.

19 5. The additional time requested by this stipulation is excludable in computing the time  
20 within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States  
21 Code, Sections 3161(h)(1)(D) and (H); and (h)(6) and (7)(A), and considering the factors under Title  
22 18, United States Code, Section 3161(h)(7)(B)(i) and (iv).

23 6. Additionally, for informational purposes only, Defense counsel are still in the process  
24 of attempting to negotiate a global resolution of the State of Nevada case and this case (both of  
25 which arise from the same conduct of the defendants) and all parties want to continue the federal  
26 case until after the state case which is scheduled for trial on February 6, 2023.

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7. This is the sixth request for a continuance filed herein.

DATED this 5th day of October, 2022.

WRIGHT MARSH & LEVY

JASON M. FRIERSON  
United States Attorney

By /s/ Richard A. Wright  
RICHARD A. WRIGHT, ESQUIRE  
MONTI JORDANA LEVY, ESQUIRE  
Counsel for Defendant Loomis

By /s/ Daniel Schiess  
DANIEL SCHIESS  
Assistant United States Attorney

THE DRASKOVICH LAW GROUP

PITARO & FUMO, CHTD.

By /s/ Robert M. Draskovich  
ROBERT M. DRASKOVICH, ESQUIRE  
Counsel for Defendant Parshall

By /s/ Thomas F. Pitaro  
THOMAS F. PITARO, ESQUIRE  
Counsel for Defendant Lynam

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, )  
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Plaintiff, )  
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vs. )  
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STEPHEN T. PARSHALL, )  
ANDREW LYNAM, and )  
WILLIAM LOOMIS, )  
 )  
Defendant. )  
 )

Case No. 2:20-CR-00128-KJD-BNW

**FINDINGS AND ORDER ON STIPULATION**

Based on the pending Stipulation between the defense counsel and the government, and good cause appearing therefore, the Court hereby finds that:

1. The Defendants need additional time to review discovery and to prepare for trial, and to consider negotiations.

2. The discovery in this case includes numerous lengthy recordings of the interactions of the defendants with a cooperating individual and an undercover agent. Many of the recordings are difficult to hear and the review with the defendants is difficult because of their detention and the difficulties of meeting in person with the defendants due to the pandemic. The utilization of video visits, which are difficult to arrange are not an adequate method to review audio recordings. Counsel for Defendant Loomis has utilized an audio enhancement expert for analysis of some of the evidence and this is an ongoing process.

3. The defendants are incarcerated and do not object to the request for a continuance.

4. The denial of this request could result in a miscarriage of justice, and the ends of justice served by granting this request outweigh the best interest of the public and the defendant in a speedy trial.

5. The additional time requested by this stipulation is excludable in computing the time within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(1)(D) and (H); and (h)(6) and (7)(A), and considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i) and (iv).

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IT IS FURTHER ORDERED, that the parties shall have to and including October 2, 2023 to file any responsive pleadings.

14 IT IS FURTHER ORDERED, that the parties shall have to and including October 9, 2023,  
15 to file any responsive pleadings.

IT IS FURTHER ORDERED that the calendar call and trial in the above-captioned matters currently scheduled for October 25, 2022, and July October 31, 2022, respectively, respectfully, be vacated and continued to a date and time convenient to this court, that is calendar call November 7, 2023, at the hour of 9:30 a.m., and trial November 13, 2023, at the hour of 9:00 a.m. in courtroom 4A.

21 || DATED this 11th day of October, 2022.

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*Kent S.*

KENT J. DAWSON  
UNITED STATES DISTRICT COURT JUDGE